

UNITED STATES DISTRICT COURT  
for the  
District of Massachusetts

United States of America )  
v. )  
ANDREW J. O'KEEFE ) Case No.  
 ) 15-MJ-1086-DLC  
 )  
 )  
 )  
 )

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 13, 2015 in the county of Bristol in the  
District of Massachusetts, the defendant(s) violated:

### *Code Section*

### *Offense Description*

18 U.S.C. Section 871(a)

defendant herein, did knowingly and willfully make a threat to take the life of or to inflict bodily harm upon the President of the United States

This criminal complaint is based on these facts:

See affidavit of SA Fred F. Mitchell III, attached hereto.

Continued on the attached sheet.



Sworn to before me and signed in my presence

Date: 06/15/2015

City and state: Boston, MA

U.S. MAGISTRATE DONALD L. CABELL

*Printed name and title*

For M. Morris

*Complainant's signature*

SA FRED F. MITCHELL III, USSS

*Printed name and title*

Dawtcell

*Judge's signature*